

# EXHIBIT B

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RHONDA HILL WILSON, ESQUIRE and THE LAW OFFICE OF RHONDA HILL WILSON, P.C.	:	CIVIL ACTION
	:	
Plaintiffs,	:	
	:	
v.	:	NO.
	:	
THE HARTFORD, USI INSURANCE SERVICES, LLC and USI AFFINITY COLBURN INSURANCE SERVICES	:	
	:	
Defendants.	:	

**DECLARATION OF JOHN R. SORRENTINO**

I, John R. Sorrentino, being of full age, declare as follows:

1. I am Assistant General Counsel of USI Insurance Services, LLC. I am handling this matter on behalf of USI and have personal knowledge of the facts set forth in this Declaration.

2. There is no legal entity known as USI Affinity Colburn Insurance Service. The names "Colburn" and "Colburn USI" were used years ago by USI Insurance Services, LLC after an acquisition made by that Company. However, the Colburn entities were merged into USI Insurance Services, LLC years ago.

3. USI Affinity is a trade name or a "doing business as" name which is used in a segment of the insurance market by USI Insurance Services, LLC.

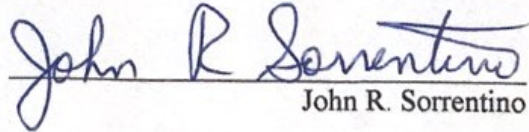
4. Therefore, the correct and only entity associated with USI named in the Rhonda Hill Wilson complaint is USI Insurance Services, LLC. Furthermore, USI Insurance Services,

LLC consents to the removal of the Rhonda Hill Wilson lawsuit from the Court of Common Pleas, Philadelphia County, Pennsylvania to the United States District Court.

5. USI Insurance Services, LLC is a Delaware limited liability company with a principal place of business located at 100 Summit Lake Drive, Valhalla, New York 10595.

6. USI Insurance Services, LLC is a sole member limited liability company, and the sole member of that company is USI, Inc. USI, Inc. is a Delaware corporation with its principal place of business located at 100 Summit Lake Drive, Valhalla, New York 10595.

I declare under penalty of perjury that the foregoing is true to the best of my knowledge, information and belief.

  
John R. Sorrentino

Date: July 8, 2020